

# Exhibit S

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS

CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A  
CENTURION PROFESSIONALS;  
MANAGEMENT & TRAINING CORPORATION  
JESSE WILLIAMS, INDIVIDUALLY;  
AND JOHN DOES 1-9

DEFENDANTS

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ZOOM DEPOSITION OF APRIL MEGGS

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Taken at the Instance of the Plaintiff  
With All Parties Appearing by Zoom Videoconferencing  
On August 5, 2020  
At 12:32 p.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR  
CSR NO. 1144

1 serious needs of patients.

2 Q. You do that, but in this case the only  
3 thing that you did about this e-mail was to  
4 terminate Dr. Woods, who's the person apparently  
5 originating the complaint -- you terminated her  
6 after the security company told you, "Well,  
7 she's no longer allowed on the facility."

8 MR. LONG-DANIELS: Objection to form.

9 A. That's per our handbook and also in  
10 everyone's offer letter. If your security  
11 clearance is pulled, you no longer work for the  
12 company.

13 BY MR. WAIDE:

14 Q. Do you have any knowledge of any reason  
15 that Dr. Woods' security clearance was pulled  
16 other than that it was believed that she had  
17 made a complaint about -- to the state  
18 representative about there not being enough  
19 staff to bring prisoners? Do you know of any  
20 reason her security clearance was taken away  
21 other than that?

22 MR. LONG-DANIELS: Objection to form.

23 A. The warden has the right to pull  
24 anyone's security clearance that he chooses.  
25 That is his ultimate right. He's the -- he's

1 the person in charge of that facility. When  
2 that happens, per our handbook and per offer  
3 letters, people are terminated after that fact.

4 BY MR. WAIDE:

5 Q. Do you feel like -- given the fact that  
6 y'all provide medical care, do you feel like  
7 y'all have a right to communicate with the  
8 warden of the prison or you don't have any right  
9 to communicate with him?

10 A. Excuse me. Could you say that again.

11 Q. Well, since the prison -- the people  
12 operating the prison are the people that are  
13 supposed to be bringing y'all patients, do you  
14 not have a right to communicate with them to  
15 make sure that they're bringing your patients so  
16 you can do your job?

17 MR. LONG-DANIELS: Objection to form.

18 Argumentative, Counsel.

19 A. That right is reserved at the facility.  
20 The HSA usually communicates with the in-house  
21 warden security measures if anything does not go  
22 accordingly. So, yes, we have a right, and,  
23 yes, we do communicate.

24 BY MR. WAIDE:

25 Q. Well, if you're concerned about if the